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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANDREA LAURIA,

Plaintiff,

vs.

UNITED STATES OF AMERICA and
BERT CHRIS HEITSTUMAN,

Defendants.

Case No. 3:20-cv-00210-SLG

NON-OPPOSED MOTION TO EXTEND PRETRIAL DEADLINES

Plaintiff Andrea Lauria, by and through counsel Cashion Gilmore & Lindemuth, hereby moves to extend the pretrial deadlines in the Scheduling and Planning Order (Doc. 38) as follows:

	CURRENTLY DUE	PROPOSED NEW DEADLINE
Motions to amend, add parties and identify expert witnesses	1/7/22	3/4/22

Supplemental expert witnesses	1/21/22	3/18/22
Plaintiff's expert reports re damages	2/7/22	4/4/22
Expert reports re liability, all parties, and defendant's expert reports re damages	4/7/22	6/2/22
Final witness lists	7/25/22	9/19/22
Discovery closes	9/7/22	11/2/22
Discovery motions	9/21/22	11/16/22
Dispositive motions and motions to exclude expert testimony	10/7/22	12/2/22

Extending the deadlines is necessary because default has been entered against defendant Bert Heitstuman and there is an outstanding question of whether default will or will not be lifted. Whether Heitstuman is defaulted or not plays a significant role in the identification and role of expert witnesses and the course of discovery. Counsel for the United States, Marie Scheperle, has indicated via email that she does not oppose this motion.

DATED this 14th day January, 2022, at Anchorage, Alaska.

CASHION GILMORE & LINDEMUTH
Attorneys for Andrea Lauria

/s/ Mera Matthews

Mera Matthews
Alaska Bar No. 0605020
John P. Cashion
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CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy of the foregoing was served via CM/ECF on January 14, 2022 on the following:

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CASHION GILMORE & LINDEMUTH

s/ Mera Matthews